

ATTACHMENT 3
INSPECTION PLAN

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[40 CFR 270.14(b)(5), 264.15; UAC R315-3-2.5(b)(5), R315-8-2.6]

The facility has a written inspection schedule. The inspection schedule identifies the types of problems to look for during the inspection. A copy of the inspection schedule is located in Table 1 below.

Inspections are recorded on inspection log forms. These forms are kept for three years from the date of inspection. Deterioration or malfunctions revealed by an inspection are remedied before they lead to an environmental or human health hazard. Examples of these inspection log forms are located in Appendix A.

The inspection records include the following minimum information:

- The date of the inspection
- The time of the inspection
- The name of the inspector
- A notation of the observations made
- The date and nature of any repairs or other remedial actions

1.0 GENERAL INSPECTION REQUIREMENTS
[40 CFR 270.14(b)(5), 264.15(a) and (b), 264.33; UAC R315-8-2.6(b)]

The waste container storage unit (CSU) is subject to RCRA inspection requirements. A schedule of required inspections is included in Table 1 below.

1.1 Types of Problems
[40 CFR 264.14(b)(5), 264.15(b)(3)]

The types of problems (e.g., malfunctions and deterioration) to look for during each inspection are specified on the example inspection log forms located in Appendix A.

Table 1
INSPECTION SCHEDULE

<i>Facility Unit(s) and Basic Elements</i>	<i>Possible Error, Malfunction, or Deterioration</i>	<i>Frequency of Inspection</i>
Hazardous waste CSU	The concrete floor and secondary containment berms of the storage area and the containers have signs of deterioration (i.e., cracks, leaks, and defects); missing labels; inadequate aisle space	Weekly
Monitoring equipment	Not applicable	Not applicable
Safety and emergency equipment	Safety and emergency equipment unsuitable for use; spill and emergency response material (e.g., absorbent materials, protective clothing) in insufficient quantities.	Monthly
Security devices (i.e., fence, gates, office alarm system, and warning signs)	Damaged or missing security devices (e.g., hole in fence, missing warning signs); malfunction in alarm system	Weekly

1.2 Frequency of Inspections
[40 CFR 264.14(b)(5), 264.15(b)(4)]

The frequency of each type of inspection is noted in the inspection schedule and on each example inspection log form included in Appendix A.

1.3 Schedule of Remedial Action
[40 CFR 270.14(b)(5), 264.15(c)]

Any deterioration or malfunction of equipment or structures that the inspection reveals will be remedied on a schedule which ensures that the problem does not lead to an environmental or human health hazard. Where a hazard is imminent or has already occurred, remedial action will be taken immediately.

1.4 Inspection Log
[40 CFR 270.14(b)(5), 264.15(d)]

Records of the inspections will be kept in inspection log forms at the facility for at least three years from the date of the inspection. At a minimum, these records will include the date and time of inspection, name of the inspector, notation of the observations made, and nature of any repairs or other remedial actions. Examples of these inspection forms are located in Appendix A.

2.0 SPECIFIC PROCESS INSPECTION REQUIREMENTS
[40 CFR 270.14(b)(5)]

2.1 Container Inspection
[40 CFR 270.14(b)(5), 264.174; UAC R315-3-2.5(b)(5), R315-8-9.5]

The hazardous waste CSU is inspected weekly. The storage area is checked for proper housekeeping. The area is inspected for general cleanliness and for proper placement and stacking of containers. Stacks are checked for damaged and leaking containers and damaged or broken containment pallets.

Containers are inspected to ensure that they are in good condition, properly closed, and properly labeled. Drum labels are checked to ensure that incompatible wastes are not being stored in the same area.

The floor and curbs of the storage areas are checked for cracks, wet spots, or erosion. The loading/unloading areas are also inspected daily whenever hazardous waste is received or shipped.

Informal inspections of the container storage areas are conducted daily; however, these inspections are not documented.

2.2 Emergency and Safety Equipment Inspection **[40 CFR 270.14(b)(5), 264.174]**

Monthly inspections of the emergency equipment listed in the Safety Equipment section of the facility's RCRA Contingency Plan (Attachment 4) are recorded on inspection log forms included as Appendix A. Absorbent materials, chemical neutralizers, first aid supplies, protective clothing, recovery drums, and tools are inspected to ensure sufficient quantities on hand and that these materials are in good condition for use. The fork lifts, phones/radios, and alarm system are inspected and tested, if necessary, to ensure readiness during a potential emergency. The fire extinguishers are inspected for fullness, and to ensure seals are intact and no damage to the hose and case is observed. All eye washes and safety showers are inspected for cleanliness and to ensure the showers are in good working order. Security devices, such as the fence, gates, and warning signs are also inspected on a weekly basis.

Actions to correct any deficiencies will be taken to ensure that no emergency or safety equipment is unsuitable for use. Following an event in which emergency and safety equipment is used; the equipment is cleaned and prepared for future use.

The frequency of each type of inspection is noted in the inspection schedule and on each example inspection log form included in Appendix A.

2.3 Tank System Inspection **[40 CFR 270.14(b)(5), 264.193(i), 264.195; UAC R315-3-2.5(b)(5), R315-8-10]**

Hazardous wastes are not managed in tank systems at this facility.

2.4 Waste Pile Inspection **[40 CFR 270.14(b)(5), 270.18(d), 264.254(b)]**

Hazardous wastes are not managed in waste piles at this facility.

2.5 Surface Impoundment Inspection **[40 CFR 270.14(b)(5), 270.17(c), 264.226(b) and (c); UAC R315-3-2.5(b)(5), R315-8-11.3]**

Hazardous wastes are not managed in surface impoundments at this facility.

2.6 Incinerator and Associated Equipment Inspection **[40 CFR 270.14(b)(5), 264.347(b)]**

Hazardous wastes are not managed in incinerators at this facility.

2.7 Landfill Inspection

[40 CFR 270.14(b)(5), 264.303(b); UAC R315-3-2.5(b)(5), R315-8-14.3]

Hazardous wastes are not managed in landfills at this facility.

2.8 Land Treatment Facility Inspection

[40 CFR 270.14(b)(5), 264.273(g); UAC R315-3-2.5(b)(5), R315-8-12.3 and 13.4]

This facility is not a land treatment facility.

2.9 Miscellaneous Unit Inspection

[40 CFR 270.14(b)(5), 264.602; UAC R315-3-2.5(b)(5), R315-8-16]

Hazardous wastes are not managed in miscellaneous units at this facility.

2.10 Boilers and Industrial Furnaces (BIF) Inspection

[40 CFR 270.14(b)(5), 264.15, 266.102(a)(2)(ii), 266.102(e)(8), 266.111(e)(3)]

Hazardous wastes are not managed in boilers or industrial furnaces at this facility.

2.11 Containment Building Inspection

[40 CFR 270.14(b)(5), 264.1101(c)(3) and (4)]

Hazardous wastes are not managed in containment buildings at this facility.

2.12 Drip Pad Inspection

[40 CFR 270.14(b)(5), 264.574]

Hazardous wastes are not managed in drip pads at this facility.

2.13 Air Emission Standards for Process Vents Inspection

[40 CFR 270.24, 264.1033; UAC R315-3-2.5(b)(5), R315-8-17]

The Ashland Clearfield facility does not operate any process vents or equipment subject to the requirements of 40 CFR 264, Subpart AA and Part 270.

2.14 Air Emission Standards for Equipment Leaks Inspection

[40 CFR 270.24, 264.1052, 1053, and 1058; UAC R315-3-2.5(b)(5), R315-8-18]

The Ashland Clearfield facility does not operate any equipment subject to the requirements of 40 CFR 264, Subpart BB and Part 270.

2.15 Air Emission Standards for Tanks, Surface Impoundments, and Containers Inspection

[40 CFR 264.1084, 1085, 1086 and 1088; UAC R315-3-2.5(b)(5), R315-8-22]

Hazardous wastes are not managed in tanks and surface impoundments at this facility. Refer to Attachment 10 for information regarding containers subject to the requirements of 40 CFR 264, Subpart CC and Part 270.

APPENDIX A

INSPECTION LOG FORMS

DAILY LOADING/UNLOADING AREA INSPECTION LOG SHEET

WEEK OF _____

ITEM INSPECTED	PROBLEMS TO LOOK FOR	<u>MONDAY</u> DATE_____		<u>TUESDAY</u> DATE_____		<u>WEDNESDAY</u> DATE_____		<u>THURSDAY</u> DATE_____		<u>FRIDAY</u> DATE_____	
		TIME_____		TIME_____		TIME_____		TIME_____		TIME_____	
		OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK
Loading/Unloading Area and Container Storage Area	Housekeeping, Cleanliness										
Base or Floor	Cracks, Wet Spots, Erosion										
Base or Floor	Leaks (and Quantity)										
INSPECTED BY:											
LIST BELOW ITEMS IN NEED OF ATTENTION DATE FIXED		LIST BELOW ITEMS IN NEED OF ATTENTION DATE FIXED									
1.		6.									
2.		7.									
3.		8.									
4.		9.									
5.		10.									
COMMENTS:											

WEEKLY CONTAINERIZED WASTE STORAGE AREA INSPECTION LOG

MONTH OF _____

PLANT AREA	ITEM INSPECTED	WEEK 1		WEEK 2		WEEK 3		WEEK 4		WEEK 5	
		DATE_____		DATE_____		DATE_____		DATE_____		DATE_____	
		TIME_____		TIME_____		TIME_____		TIME_____		TIME_____	
		OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK
Containerized waste area	Container condition/corrosion, leaks, defects										
	Condition of Pallets										
	Impervious surface/cracks, deterioration/curbing										
	Container placement/aisle space, stack height										
	General Housekeeping										
	Labeling of containers										
	Warning signs										
INSPECTED BY:											
1. Storage Bay 1 (12,320 Gal Max)											
2. Storage Bay 2 (9,240 Gal Max)											
3. Storage Bay 3 (9,240 Gal Max)											
4. Storage Bay 4 (1,760 Gal Max)											
Total (32,560 Gal Max)											
LIST BELOW ITEMS IN NEED OF ATTENTION				DATE FIXED		LIST BELOW ITEMS IN NEED OF ATTENTION				DATE FIXED	

WEEKLY SECURITY DEVICES INSPECTION LOG SHEET

MONTH OF _____

ITEM INSPECTED	PROBLEMS TO LOOK FOR	WEEK 1		WEEK 2		WEEK 3		WEEK 4		WEEK 5	
		DATE_____		DATE_____		DATE_____		DATE_____		DATE_____	
		TIME_____		TIME_____		TIME_____		TIME_____		TIME_____	
		OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK	OK	NOT OK
Facility Fence	Corrosion, Damage to Chain Link Fence										
Gate #1 Main Entrance Gate	Corrosion, Damage to Gate & Lock										
Main Exit Gate	Corrosion, Damage to Gate										
Main Gate	Corrosion, Damage to Gate										
Warning Signs	Are Signs Readable, Damaged, Missing										
INSPECTED BY:											
LIST BELOW ITEMS IN NEED OF ATTENTION		DATE FIXED		LIST BELOW ITEMS IN NEED OF ATTENTION		DATE FIXED					
1.		6.									
2.		7.									
3.		8.									
4.		9.									
5.		10.									
COMMENTS:											

MONTHLY INSPECTION LOG FOR EMERGENCY EQUIPMENT

Inspector: _____ Time: _____ Date: _____

ITEM INSPECTED	PROBLEMS TO LOOK FOR	USE STATUS		OBSERVATIONS	DATE & TYPE OF REMEDIAL ACTIONS
		O.K.	NOT O.K.		
Absorbent Materials	2 Boxes of Pads Minimum				
Chemical Neutralizers	2 Bags Minimum				
Fire Extinguishers	Seals Intact/Gauge Full/Case & Hose Undamaged				
Water Sprinkler System	In Working Order				
Recovery Drums	Recovery Drums Available				
Eye Wash Fountains	In Clean & Working Condition				
Safety Showers	In Clean & Working Condition				
First Aid Kits	In Good Condition				
Acid Suits, Aprons, Goggles, Gloves & Hard hats	Equipment Available for 2 Persons				
Emergency Air Horn	Canister Unit in Place				
Portable Radios	Operational				
Fork Lifts	Operational				